

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOHN A. ABRAHAM, M.D.

Plaintiff

v.

THOMAS JEFFERSON UNIVERSITY AND  
THOMAS JEFFERSON UNIVERSITY  
HOSPITAL, INC.

Defendants

Civil Action No. 2:20-cv-02967-MMB

**PLAINTIFF'S MOTION TO COMPEL**

Pursuant to Rule 37(a)(1) of the Federal Rules of Civil Procedure, Local Rule of Civil Procedure 26.1(f), and Paragraph (C)(1) of the Court's Pretrial and Trial Procedures – Civil Cases, Plaintiff John A. Abraham, M.D. ("Plaintiff" or "Dr. Abraham") hereby file this Motion to Compel and, in support thereof, relies on and incorporates by reference its Memorandum of Law in Support of Plaintiff's Motion to Compel, which is being filed simultaneously herewith.

Date: November 4, 2022

Respectfully submitted,

By: /s/ Andrew Miltenberg

Andrew T. Miltenberg, Esq.  
Stuart Bernstein, Esq.  
Amy Zamir, Esq.  
NESENOFF & MILTENBERG, LLP  
363 Seventh Ave, 5th Floor  
New York, New York 10001  
(212) 736-4500  
amiltenberg@nmllplaw.com  
sbernstein@nmllplaw.com  
azamir@nmllplaw.com  
*Attorneys for Plaintiff*

By: /s/ Lance Rogers

Lance Rogers, Esq.  
ROGERS COUNSEL  
26 East Athens Avenue  
Ardmore, PA 19003  
lance@rogerscounsel.com  
*Local Counsel for Plaintiff*